

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

BRAD AMOS,	)	
	)	
Plaintiff,	)	Case No. 3:21-cv-00923
	)	
v.	)	District Judge Richardson
	)	
THE LAMPO GROUP, LLC, et al,	)	Magistrate Judge Holmes
	)	
Defendant.	)	

**MOTION TO DISMISS BY DEFENDANT, THE LAMPO GROUP, LLC**

Defendant, The Lampo Group, LLC, (“Lampo”) by and through the undersigned counsel and pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, moves the Court to dismiss all claims filed against it in this case by Plaintiff, Brad Amos, with prejudice.

This is an employment case. Plaintiff was formerly employed by Lampo. Defendant, Dave Ramsey, (“Ramsey”) is also employed by Lampo as the company’s CEO.

Plaintiff’s Complaint (Doc. #1) asserts claims against Lampo for retaliatory discharge under the Tennessee Public Protection Act, T.C.A. §50-1-304, religious discrimination in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §2000e, *et seq.*, fraud, negligent misrepresentation, promissory estoppel, and violations of T.C.A. §50-1-102. As explained in Lampo’s concurrently filed memorandum of law (Doc. #15), these claims are patently frivolous since they are not even supported by factual allegations in Plaintiff’s Complaint, time-barred, and/or not even available under applicable law.

Given the defects in Plaintiff’s claims against Lampo, we respectfully ask the Court to dismiss them with prejudice and award any other relief to Lampo that the Court deems appropriate.

Respectfully submitted,

/s/Daniel Crowell

Leslie Goff Sanders (TN #18973)

Daniel Crowell (TN #31485)

**JACKSON LEWIS P.C.**

CitySpace

611 Commerce Street

Suite 3102

Nashville, TN 37203

Telephone: (615) 915-3300

leslie.sanders@jacksonlewis.com

daniel.crowell@jacksonlewis.com

*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I certify that, on February 11, 2022, I caused the foregoing *Motion to Dismiss by Defendant, The Lampo Group, LLC*, to be filed via the Court's electronic filing system, which will automatically notify and send a copy of the filing to:

Jonathan A. Street

Brandon Hall

Cullen Hamelin

Lauren Irwin

THE EMPLOYMENT LAW AND CONSUMER LAW GROUP

street@eclaw.com

bhall@eclaw.com

chamelin@eclaw.com

lauren@eclaw.com

*Attorneys for Plaintiff*

/s/Daniel Crowell

Daniel Crowell (TN #31485)

*Attorney for Defendants*